

DOCKET NO.: FST CV15 50148-08 S : SUPERIOR COURT  
WILLIAM A. LOMAS : J.D. OF STAMFORD/NORWALK  
VS. : AT STAMFORD  
PARTNER WEALTH MANAGEMENT, LLC  
ET AL. : MARCH 24, 2016

### **MOTION FOR ADMISSION PRO HAC VICE**

Pursuant to Connecticut Practice Book Section 2-16, the undersigned hereby moves for admission pro hac vice of Gerard P. Fox, Esq. and represents as follows:

1. Attorney Fox is a lawyer with the law firm of Gerard Fox Law P.C., a practice with offices located at 12 East 49<sup>th</sup> Street, Suite 2605, New York, NY 10017, and 1880 Century Park East, Suite 1410, Los Angeles, CA 90067.

2. In conjunction with this motion, Attorney Fox has filed a duly sworn and executed Affidavit setting forth all of the information required pursuant to Connecticut Practice Book Section 2-16, which Affidavit is attached hereto and made a part hereof as ***Exhibit A***.

3. Good causes exists to grant this motion because Attorney Fox has a longstanding personal relationship with the defendant Kevin G. Burns, which predates this matter, and has significant experience litigating and trying cases concerning issues raised in the complaint and likely to be raised in defendants' pleading. Mr. Burns has discussed with the

BERCHEM, MOSES  
& DEVLIN, P.C.  
COUNSELORS AT LAW  
75 BROAD STREET  
MILFORD, CONNECTICUT  
06460

JURIS NUMBER

22801

(203) 783-1200

{00874528.DOC Ver. 1}

defendants James Pratt-Heany and William Loftus having Attorney Fox represent them and the company in which all three are members, the defendant Partner Wealth Management, LLC. Defendants Burns, Pratt-Heaney, and Loftus each wish Attorney Fox to represent them and Partner Wealth Management, LLC. Due to this longstanding relationship and Attorney Fox's background and qualifications, he possesses specialized skill and knowledge with regard to the defendants' affairs which will be of benefit to them in litigating this matter.

WHEREFORE the undersigned sponsoring attorney respectfully requests that this motion be granted.

THE DEFENDANTS,

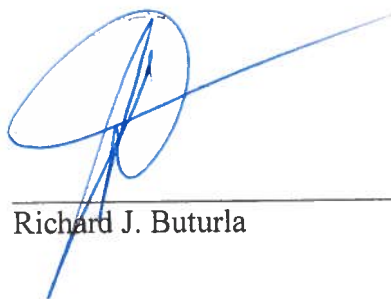
BY 

Richard J. Buturla  
Berchem, Moses & Devlin, P.C.  
75 Broad Street  
Milford, CT 06460  
Tel. (203) 783-1200  
Juris # 022801

## CERTIFICATION

This is to certify that a copy of the foregoing has been mailed, postage prepaid, on the  
24<sup>th</sup> day of March, 2016 to:

McCarter & English LLP  
City Place 1  
185 Asylum Avenue, 36<sup>th</sup> Floor  
Hartford, CT 06103



Richard J. Buturla

# EXHIBIT A

BERCHEM, MOSES  
& DEVLIN, P.C.  
COUNSELORS AT LAW  
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**AFFIDAVIT OF GERARD P. FOX  
IN SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE**

STATE OF NEW YORK	)	
	)	ss:
COUNTY OF NEW YORK	)	

GERARD P. FOX, being duly sworn, deposes and says:

1. I am over 18 years of age and believe in the obligations of an oath. I hereby certify that the following statements are true to the best of my knowledge, information, and belief.
2. I am admitted and in good standing to practice law in Maryland, Washington, D.C., and California and am a member with the law firm of Gerard Fox Law P.C.
3. I have never had a grievance proceeding against me in Maryland, Washington, D.C., California, or in any other jurisdiction.

4. I have never been reprimanded, suspended, placed on inactive status, disbarred, or otherwise disciplined and have never resigned from the practice of law.

5. I have paid the client security fund fee due for this calendar year and will pay such fee when due for each year that I continue to appear in the above-captioned matter.

6. I hereby designate the Chief Clerk of the Superior Court for the Judicial District of Stamford / Norwalk as my agent upon whom process and service of notice may be served.

7. I hereby agree to register with the Statewide Grievance Committee while appearing in the above-captioned matter and for a period of two years after its completion and agree to notify the Statewide Grievance Committee of the expiration of the two-year period.

8. I have not previously appeared pro hac vice in the Connecticut Superior Court.

9. The defendants, Partner Wealth Management, LLC, Kevin G. Burns, James Pratt-Heany, and William Loftus, desire to have me assist their Connecticut counsel in the above-matter.

10. I have had a longstanding personal relationship with the defendant Kevin G. Burns, which predates this matter, and significant experience litigating and trying cases concerning issues raised in the complaint and likely to be raised in defendants' pleading. I understand that Mr. Burns has discussed with the defendants James Pratt-Heany and William Loftus having me represent them and the company in which all three are members, defendant

Partner Wealth Management, LLC, and that each of the three individuals wish that I represent them and the company. I therefore possess specialized skill and knowledge with regard to the defendants' affairs which will be of benefit to them in litigating this matter.

11. I agree to comply with and be subject to the orders of this Court.

12. I will associate with and have an attorney from the law offices of Berchem, Moses & Devlin, P.C., whose attorneys are duly and legally admitted to practice in the State of Connecticut, personally appear with me at all proceedings and understand that they must sign all pleadings, briefs, and other filings.



Gerard P. Fox

Subscribed and sworn to before me this 23 day of March 2016.



Notary Public / Commissioner of the  
Superior Court

MARC L. POTOLSKY  
Notary Public, State of New York  
No. 02PO6172763  
Qualified in New York County  
Commission Expires August 13, 2019